

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: CHANGE HEALTHCARE, INC.
CUSTOMER DATA SECURITY BREACH
LITIGATION

MDL No. 24-3108 (DWF/DJF)

This Document Relates to:

SARA LEMKE, et al., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

CHANGE HEALTHCARE INC., et al.,

Defendants,

and

HEALTHFIRST, INC.,

Defendant and Defendant's
Class Representative.

No. 0:24-cv-03813

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE
PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i)**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiff M.A.D. Billing, Inc. ("Dismissing Plaintiff") hereby voluntarily dismisses its claims in the above captioned action against Defendant HEALTHFIRST, INC. without prejudice.

Defendant HEALTHFIRST, INC. is dismissed without prejudice. This case shall continue against all remaining Defendants.

All Plaintiffs' claims, including dismissing Plaintiff's claims, against the remaining

Defendants shall continue, unencumbered by this voluntary dismissal of Defendant HEALTHFIRST, INC.

This Notice of Voluntary Dismissal is being filed with the Court before service by Defendant HEALTHFIRST, INC. of either an answer or a motion for summary judgment.

In the event of a future recovery in this action, nothing in the foregoing shall prevent Dismissing Plaintiff from submitting a claim as a Plaintiff or absent class member and/or from participating in any settlement or judgment as a Plaintiff or absent class member.

Dated: March 5, 2025

Respectfully submitted,

/s/ Thomas A. Zimmerman, Jr.
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, on this date, the foregoing document was served by filing it on the Court's CM/ECF system, which will automatically send a notification of such filing to all counsel of record via electronic mail.

/s/ Thomas A. Zimmerman, Jr.
Thomas A. Zimmerman, Jr.